

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	CHAPTER 11
	§	
STEWARD HEALTHCARE SYSTEM	§	CASE NO. 24-90213
LLC, <i>et al.</i>,¹	§	
	§	(Jointly Administered)
Debtors.	§	

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the law firm of KTBS Law LLP has been retained as counsel to represent Medical Properties Trust, Inc., and certain of its affiliates listed on **Schedule 1** attached hereto, creditors and parties-in-interest in the above-styled case, and pursuant to § 1109(b) of the U.S. Bankruptcy Code, Rules 2002, 3017(a) and 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned requests that all Notices given and required to be served in this case be given to and served upon the following counsel of record for Medical Properties Trust, Inc. and its affiliates:

Thomas E. Patterson (*pro hac vice application pending*)
CA Bar No. 130723
Sasha M. Gurvitz (*admitted pro hac vice*)
CA Bar No. 301650
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¹ A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at <http://restructuring.re.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

PLEASE TAKE FURTHER NOTICE that pursuant to § 1109(b) of the U.S. Bankruptcy Code, the foregoing request includes the notice and papers referred to in Rule 2002 of the Bankruptcy Rules and also includes without limitation, any plan of reorganization and objections thereto, and notice of any orders, pleadings, motions, applications, complaints, demand, hearings, disclosure statements, answers, responses, memorandum of briefs in support of the foregoing and any other documents brought before the Court with respect to these pleadings, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile or otherwise which affects or seeks to affect the above case.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notice is not intended to waive (i) the rights of Medical Properties Trust, Inc. and its affiliates to withhold consent to the entry of final orders or judgment by the Bankruptcy Court pursuant to Fed. R. Bankr. P. 7008; (ii) the rights of Medical Properties Trust, Inc. and its affiliates to have final orders in non-core matters entered only after *de novo* review by a district court judge; (iii) the rights of Medical Properties Trust, Inc. and its affiliates to a jury trial in any proceedings so triable herein, or in any case, controversy or proceeding related hereto; (iv) the rights of Medical Properties Trust, Inc. and its affiliates to have a reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (v) any other rights, claims, actions, defenses, setoffs or recoupments to which Medical Properties Trust, Inc. and its affiliates are or may be entitled under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ**

A Professional Corporation

By: /s/ Daniel J. Ferretti

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**ATTORNEYS FOR MEDICAL PROPERTIES
TRUST, INC. AND CERTAIN OF ITS
AFFILIATES**

SCHEDULE 1

List of Medical Properties Trust, Inc. Affiliates

1. MPT Operating Partnership, L.P.
2. MPT TRS Lender-Steward, LLC
3. MPT Sycamore Opco, LLC
4. MPT of Ayer-Steward, LLC
5. MPT of Brighton-Steward, LLC
6. MPT of Brockton-Steward, LLC
7. MPT of Dorchester-Steward, LLC
8. MPT of Fall River-Steward, LLC
9. MPT of Methuen-Steward, LLC
10. MPT of Haverhill-Steward, LLC
11. MPT of Taunton-Steward, LLC
12. MPT of Hillside-Steward, LLC
13. MPT of Melbourne-Steward, LLC
14. MPT of Rockledge-Steward, LLC
15. MPT of Sebastian-Steward, LLC
16. MPT of Sharon-Steward, LLC
17. MPT of Warren-Steward, LLC
18. MPT of Youngstown-Steward, LLC
19. MPT of Mesa, LLC
20. MPT of West Monroe, LLC
21. MPT of Port Arthur, LLC
22. MPT of Hope-Steward, LLC
23. MPT of Odessa-Steward, LLC
24. MPT of Phoenix-Steward, LLC
25. MPT of Phoenix Behavioral – Steward, LLC
26. MPT of San Antonio – Steward, LLC
27. MPT of Tempe-Steward, LLC
28. MPT of Texarkana–Steward, LLC
29. MPT of Maricopa RE-Steward, LLC
30. MPT of Ogden RE-Steward, LLC
31. MPT of Phoenix RE-Steward, LLC
32. MPT of Port Arthur RE-Steward, LLC
33. MPT of San Antonio RE-Steward, LLC
34. MPT of Norwood-Steward, LLC
35. MPT of Houston-Steward, LLC
36. MPT of Houston RE-Steward, LLC
37. MPT of Big Springs-Steward, LLC
38. MPT of Florence-Steward, LLC
39. MPT of Coral Gables-Steward, LLC
40. MPT of Lauderdale Lakes-Steward, LLC
41. MPT of Hialeah-Steward, LLC
42. MPT of Hialeah Palmetto-Steward, LLC
43. MPT of Miami-Steward, LLC

- 44. MPT of Mesa Superstition-Steward, LLC
- 45. MPT of Coral Terrace-Steward, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2024, a true and correct copy of the foregoing was served by Electronic Case Filing system for the United States Bankruptcy Court for the Southern District of Texas which will send notice of electronic filing to all counsel of record who have consented to electronic filing.

/s/ Daniel J. Ferretti
Daniel J. Ferretti